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*Chapter 11 Debtor and Debtor-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

**DARYL FRED HELLER,**

Debtor.

Case No. 25-11354 (JNP)

Chapter 11

Honorable Jerrold N. Poslusny, Jr., U.S.B.J.

**STATEMENT AS TO WHY NO BRIEF IS NECESSARY IN  
CONNECTION WITH THE MOTION AUTHORIZING DHQM  
PROPERTIES, LLC TO ALLOCATE AND DISTRIBUTE INTERESTS IN  
NON-DEBTOR PROPERTIES TO ACCORDO, L.P. AND QDM  
PROPERTIES, LLC; AND FOR RELATED RELIEF**

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**PLEASE BE ADVISED** that pursuant to D.N.J. LBR 9013-1(a)(3) no brief is necessary to be presented in support of the Motion for an Order Authorizing DHQM Properties, LLC to Make an Allocation and Distribution of Interests in Non-Debtor Properties to Accordo, L.P. and QDM Properties, LLC; and for Related Relief because the relief requested does not involve any unique facts or novel issues of law.

**McMANIMON, SCOTLAND & BAUMANN, LLC**

*Counsel to Daryl Fred Heller*

*Chapter 11 Debtor and Debtor-in-Possession*

By: /s/ Sari B. Placona, Esq.  
SARI B. PLACONA, ESQ.

Dated: July 23, 2025